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IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ALASKA

ENOCH ADAMS, JR., LEROY ADAMS,)	
ANDREW KOENIG, JERRY NORTON,)	
DAVID SWAN, JOSEPH SWAN,)	
Plaintiffs,)	
)	
vs.)	
)	
TECK COMINCO ALASKA)	
INCORPORATED,)	
Defendant,)	
)	
NANA REGIONAL CORPORATION, and)	
NORTHWEST ARCTIC BOROUGH,)	
Intervenor-Defendants.)	Case No.: A04-00049 CV (JWS)
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**TECK COMINCO ALASKA INCORPORATED'S
MOTION TO ADD WITNESS**


Teck Cominco moves to supplement its witness list by adding Robert Napier.

Mr. Napier is a Teck Cominco employee who was hired as an Environmental Coordinator at Red Dog Mine in 2007. He can offer testimony as to facts concerning claims first presented in the supplemental complaint filed by the plaintiffs in the autumn of 2007, and DMR's that were prepared in late 2007 and 2008 that the

plaintiffs have asserted are at issue. It would have been impossible to add Mr. Napier to the witness list prior to the deadline, since he had no involvement in any aspect of this case prior to that time and his testimony only became relevant much later. Other persons on the witness list are not able to address some of the facts recently placed in issue, and Teck Cominco would be fundamentally prejudiced if Mr. Napier was not permitted to testify at trial.

DATED at Anchorage, Alaska, this 22nd day of January, 2008.

HARTIG RHODES HOGE & LEKISCH, P.C.
Attorneys for Teck Cominco Alaska, Inc.

By: 
Sean Halloran

CERTIFICATE OF SERVICE

I hereby certify that on the 22nd day of January, 2007,
a true and correct copy of the foregoing was served,
via electronic service, on the below identified parties of
record:

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